

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	:	
vs.	:	19 Cr. 373 (PGG)
MICHAEL AVENATTI,	:	
Defendant.	:	

**DECLARATION OF SCOTT A. SREBNICK, ESQ.,
IN SUPPORT OF DEFENDANT AVENATTI'S
MOTION FOR BILL OF PARTICULARS**

I, Scott A. Srebnick, Esq., pursuant to 28 U.S.C. §1746, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am a member of the law firm of Scott A. Srebnick, P.A., co-counsel for Defendant Michael Avenatti in this case. I submit this Declaration, pursuant to Local Rule 16.1, in connection with Mr. Avenatti's motion for bill of particulars, filed contemporaneously herewith.

2. On or about July 15, 2019, I e-mailed a letter to government counsel asking whether the government would be willing "to identify the 'others known and unknown' – other than Mr. Geragos – who allegedly conspired with Mr. Avenatti, if there indeed are any such individuals."

3. I had additional e-mail exchanges regarding this matter with the government on July 24, July 26, and July 30, in an effort to reach agreement on this request.

4. I certify that a good faith effort was made to resolve by agreement the issues raised by the motion without the intervention of the Court, but the parties have been unable to reach agreement.

Dated: August 16, 2019

By: /s/Scott A. Srebnick
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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2019, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Scott A. Srebnick
Scott A. Srebnick